

March 12, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Telephone Number Portability, et al.**
WC Docket Nos. 09-109, 07-149; CC Docket No. 95-116

Dear Ms. Dortch:

The North American Portability Management LLC ("the NAPM LLC") and iconectiv write to provide additional information about contingency rollback plans for the Local Number Portability Administrator ("LNPA") transition and the testing that has been done of the essential elements of the standing contingency rollback plan based on industry resubmission of porting transactions. As we explain below, the core elements of the standing contingency rollback plan either have been tested or are simply service providers (or their service bureaus) submitting porting transactions to Neustar in the same manner as they would have done had a cutover never occurred.

First and foremost, the chance that contingency rollback will be necessary is "vanishingly small," as iconectiv has previously noted.¹ Even if rollback becomes necessary, the potential burdens on carriers to resubmit failed porting transactions would be very small because:

- the cutover will occur on Sunday, when most carriers do not submit porting transactions; and
- the need for contingency rollback should be apparent within the first few hours, and no later than 24 hours, after cutover.

Importantly, the carriers that face the biggest potential burden because they submit the highest volumes of porting transactions on Sundays – AT&T Wireless, Sprint, T-Mobile and Verizon

¹ See Letter from John T. Nakahata, Counsel to iconectiv, to the Hon. Ajit Pai, Chairman, FCC, WC Docket Nos. 09-109, 07-149, CC Docket No. 95-116 (filed Feb. 20, 2018). If contingency rollback is not necessary for the first cutover, the vanishingly small chance that contingency rollback would be necessary for any of the subsequent regions becomes almost negligible.

Wireless – all strongly support maintaining the current transition schedule with industry-led contingency rollback.²

Neustar repeatedly characterizes the standing contingency rollback plan as “manual,” but this is a somewhat misleading label. The standing contingency rollback plan would have carriers resubmit to Neustar porting transactions that they previously submitted to iconectiv; those porting transactions could be submitted through existing processes such as a Graphical User Interface or Service Provider’s automated gateways. In other words, for those providers that use automated mechanisms to submit ports, the actual resubmission process is not different from the resubmission process of porting transactions today. This is not a situation in which service providers would send Neustar a spreadsheet of porting transactions for Neustar to enter into its gateways.

While the standing contingency rollback plan does not provide for a database-to-database transfer between the iconectiv and Neustar NPACs of completed porting transactions, the standing contingency rollback plan would be a necessary component of any rollback plan even if such a database-to-database transfer were available. This resubmission process would be needed for any porting transactions not captured by the iconectiv database. In addition, resubmission of porting transactions happens today when a porting transaction fails, so resubmission itself is not novel. In other words, Neustar is disputing the feasibility of a process that occurs today and that would be a necessary back-up component even under Neustar’s preferred contingency rollback plan.

As directed in Chairman Pai’s letter of February 2, 2018, the subject of recent negotiations among the parties is Neustar’s claim that Neustar will not resume processing ports upon request from the NAPM LLC if iconectiv has attempted to process a single port, but suffers a catastrophic failure. Neustar takes this position even though:

- Neustar would be the sole entity in the United States in possession of critical infrastructure used for number porting;
- Neustar would still be serving as the LNPA for other regions, processing all ports in those regions, except with respect to the May 20 scheduled cutover, in which case Neustar would have just ceased processing ports;
- The request would come, if at all, within the first 24 hours of the affected regional cutover, and, if requested at all, is most likely to come within 24 hours of the cutover planned for April 8, 2018;
- Neustar would not need any information from iconectiv; Neustar would simply resume providing the same services it provides today, receiving porting transactions from the

² While carriers are already able to test their preparations for industry-led contingency rollback and the NAPM LLC believes that there is no reason for any carrier to be concerned about the standing plan for industry-resubmission contingency rollback, the NAPM LLC would not oppose clarification by the FCC that any carrier which is not confident about its own ability to resubmit failed port requests could wait to begin initiating new ports until 24 hours after cutover.

service providers in exactly the same way it has for decades, as if the cutover had not been attempted during the maintenance window;

- Neustar's contract term for any regions, including the Southeast Region scheduled for cutover on April 8, 2018, does not end until the completion of the transition for all seven regions, currently scheduled for May 25, 2018. In addition, the NAPM LLC can extend Neustar's contract term for 6 months by providing notice to Neustar at any time before May 26, 2018;
- Neustar compensation is not reduced as individual regions are cutover, but remains the same until all regions are successfully transitioned – currently scheduled for May 25, 2018. Thus, Neustar's refusal to accommodate the industry-led rollback would be its refusal to continue service that it would otherwise be paid to provide;
- The NAPM LLC has offered to waive all contractual service quality penalties in connection with operations during contingency rollback; and
- Neustar is entitled to its costs plus 10% for all extra costs that Neustar incurs due to the transition, including all costs, if any, associated with contingency rollback not covered by its existing compensation.

Neustar claims that it cannot participate in an "untested" solution. However, the fundamental actions and components of the standing contingency rollback mechanism have been or will be tested prior to cutover, or are the same submission processes that providers are already using to submit ports. Specifically, if needed, the standing contingency rollback mechanism would include the following actions or components:

- **Communication of Decision to Rollback:** The TOM will be conducting an open Web Conference with periodic, live teleconference bridges where the status of the cutover will be updated on an ongoing basis, including any information about a contingency rollback. Testing for this process is scheduled for March 19.
- **Switching Connectivity from iconectiv Back to Neustar:** In the event of a contingency rollback, mechanized service providers and service bureaus would need to switch their connectivity from the iconectiv NPAC back to the Neustar NPAC. There are 11 service providers (counting all affiliates together regardless of the number of connections to the NPAC) and 3 Service Bureaus that require direct connectivity with the NPAC for porting transactions. In addition, there are some directly connected Providers of Telecommunications Related Services (PTRS) that do not engage in porting transactions, but receive NPAC data for rating, routing and billing purposes. To date, connectivity testing has been successfully completed for nearly 90% of all the mechanized interfaces. All remaining connectivity testing is scheduled for the weekend of March 17. Each of these entities with a mechanized connection conducts these tests, during a maintenance window, by switching connectivity from the Neustar NPAC to the iconectiv NPAC, testing that it can successfully transmit and verify credentials, and then switching its connectivity back to the Neustar NPAC and reestablishing the ability to

transmit data to the Neustar NPAC. Because one of the first steps in the standing contingency rollback plan would be to open a maintenance window so that service providers and service bureaus could switch connectivity back to Neustar, this connectivity testing proves carriers can reconnect back to the Neustar NPAC if necessary due to a contingency rollback.

- **Optional Porting Transaction Reports:** iconectiv has developed contingency rollback porting transaction reports to assist impacted service providers as a secondary means for identifying porting transactions submitted during the period following the cutover and any decision to rollback. The capability to create these reports has been successfully tested by generating sample reports, and making those sample reports available to interested service providers.
- **Post-Rollback LNPA Information:** At the request of Neustar, iconectiv has agreed to deliver several reports, including Object ID and Timer Information, that Neustar could use in the event of a contingency rollback. iconectiv has successfully completed testing of its ability to generate this information.
- **Service Provider Methods and Procedures:** Each service provider that has processed porting transactions during the period between cutover and the declaration of a contingency rollback will need to reprocess those porting transactions with Neustar following their own internal methods and procedures. Many service providers have already developed and successfully tested, or plan to test, their own internal methods and procedures and these processes are currently in practice and are utilized when out of synch conditions occur with the Neustar NPAC, including the service providers expected to process the highest volume of porting transactions on Sunday, April 8, 2018 (e.g., AT&T, Comcast, Sprint, T-Mobile and Verizon Wireless).
- **Neustar Begins Processing Porting Transactions Again:** As service providers begin resubmitting porting transactions to Neustar, Neustar will have to process those porting transactions in exactly the same way it has for decades. This does not require additional testing. The current operation of the NPAC demonstrates that Neustar has the ability to successfully process any and all such porting transactions.

Importantly, the fundamental actions and components of contingency rollback are already currently in use by service providers today, and they are employed when out of synch conditions occur in Neustar's NPAC. The supplemental testing described above further confirm that any material risks that could be associated with contingency rollback have been adequately and appropriately mitigated. Accordingly, the NAPM LLC and iconectiv agree that no further testing of contingency rollback is necessary.

Despite our joint belief that no additional testing is necessary, we remain willing to engage in discussions with Neustar about additional testing. We will be simultaneously reaching out to Neustar with a draft proposal for such additional testing. With and in light of that proposed additional testing, we will again request that Neustar agree to participate in the standing

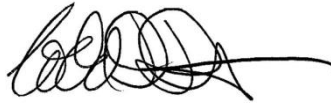
contingency rollback plan by undertaking the following narrowly tailored asks of Neustar to support a workable rollback plan and a seamless, timely transition:

- Neustar maintains a working NPAC system that the industry can connect to in the unlikely event of catastrophic failure once iconectiv's new NPAC goes live.
- Neustar, upon request by the NAPM LLC, resumes accepting and processing ports from service providers.
- Neustar maintains help desk operations to facilitate issue resolution.

All that remains now is for Neustar to embrace its obligation to do all it can to support the transition including agreeing to support the standing contingency rollback plan based on industry resubmission of porting transactions.

The NAPM LLC and iconectiv remain committed to carrying out all of our respective transition duties in good faith and with the interests of the American public as our foremost priority. Please contact the undersigned if you have any questions or need additional information.

Sincerely,



Todd D. Daubert
Counsel to the NAPM LLC

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